

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA §
VS. § NO. 4:22-cr-00471-1
EMMANUEL FINNIH §

**UNOPPOSED MOTION TO CONTINUE JURY TRIAL
AND TO ENTER A NEW SCHEDULING ORDER**

TO THE HONORABLE JUDGE ANDREW S. HANEN, UNITED STATES DISTRICT JUDGE FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION:

COMES NOW, EMMANUEL FINNIH, defendant, moves this Honorable Court to continue the jury trial and to enter a new scheduling order and for good cause would show as follows:

I.

Pretrial conference is set for April 21, 2025, and Jury Trial is set April 28, 2025.

II.

Counsel for defendant requests a continuance of at least 30 days, to a date after June 1, 2025, for the following reasons. Counsel needs this additional time to continue to meet with government, defendant, and enter meaningful plea negotiations or adequately prepare for trial. Counsel for defendant has been

working closely with counsel for the government in an effort to resolve this case without the need for a trial.

III.

Based on the reasons presented herein, Defendant respectfully requests that this Honorable Court continue the trial for at least 30 days, to a date after June 1, 2025. A continuance of the trial setting should be excluded from the Speedy Trial limitations pursuant to 18 U.S.C. § 3161(h)(8)(A) for the ends of justice are served by such continuance and the need for the continuance outweighs the best interest of the public and the defendant in a speedy trial.

WHEREFORE, PREMISES CONSIDERED, Defendant herein requests that this Court, in accordance with United States Code, Title 18, § 3161(h)(8)(A), determine that the ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial and enter an Order continuing the trial date and all other pre-trial deadlines to a date consistent with the above requests and convenient with the Court's schedule.

This motion is made, not for the purpose of delay, but that justice may be done. WHEREFORE, PREMISES CONSIDERED, Defendant, respectfully prays that the Court grant this motion.

Respectfully submitted,

/s/ Kent A. Schaffer _____

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CERTIFICATE OF CONFERENCE

Counsel for Defendant conferred with AUSA Shirin Hakimzadeh concerning her position on Defendant's Motion to Continue. Ms. Hakimzadeh stated she is unopposed.

/s/ Kent A. Schaffer
KENT A. SCHAFFER

CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send an email notification of this filing to all registered parties.

/s/ Kent A. Schaffer
KENT A. SCHAFFER